

Margaret M. Fox

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April 20, 2018

Ms. Jocelyn Boyd Chief Clerk and Administrator South Carolina Public Service Commission Synergy Business Park, The Saluda Building 101 Executive Center Drive Columbia SC 29210

Re:

Application of Peak Tower, LLC for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities-Based Local Exchange, Exchange Access and Interexchange Telecommunications Services in the State of South Carolina, and for Alternative and Flexible Regulation, and a Request for Confidential Treatment

Docket No. 2018-113-C

Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition (the "Coalition"), a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service all parties of record will receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Sincerely,

McNAIR LAW FIRM, P.A.

Varguetly. Day

Margaret M. Fox

MMF:khh

Enclosure: as stated

McNAIR LAW FIRM, P.A. 1221 Main Street Suite 1800

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# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2018-113-C

| Re: | Application of Peak Tower, LLC for a Certificate of Public Convenience and Necessity to Provide Resold and Facilities- Based Local Exchange, Exchange Access and Interexchange Telecommunications Services in the State of South Carolina, and for Alternative and Flexible Regulation, and | ) ) ) ) | PETITION TO INTERVENE |
|-----|---|---------|-----------------------|
|     | a Request for Confidential Treatment  | _)      |                       |

In response to the Commission's Notice of Filing of the Application of Peak Tower, LLC ("PEAK TOWER") for a Certificate of Public Convenience and Necessity to provide local exchange and interexchange (including exchange access) telecommunications services in South Carolina, the South Carolina Telephone Coalition ('SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

- 1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."
- 2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
- 3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would

potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
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By:

Attorneys for Intervenor South Carolina Telephone Coalition

April 20, 2018

Columbia, South Carolina

#### **EXHIBIT A**

## South Carolina Telephone Coalition Member Companies for Purposes of Local Service Stipulation

Chesnee Telephone Company

Chester Telephone Company, d/b/a TruVista

Comporium, Inc. (f/k/a Rock Hill Telephone Company)

Farmers Telephone Cooperative, Inc.

Ft. Mill Telephone Company, d/b/a Comporium

Home Telephone ILEC, LLC d/b/a Home Telecom

Lancaster Telephone Company, d/b/a Comporium

Lockhart Telephone Company, d/b/a TruVista

McClellanville Telephone Company (TDS)

Norway Telephone Company (TDS)

Palmetto Rural Telephone Cooperative, Inc.

Piedmont Rural Telephone Cooperative, Inc.

PBT Telecom, d/b/a Comporium

Ridgeway Telephone Company, d/b/a TruVista

St. Stephen Telephone Company (TDS)

West Carolina Rural Telephone Cooperative, Inc.

Williston Telephone Company (TDS)

#### **BEFORE**

### THE PUBLIC SERVICE COMMISSION OF

#### SOUTH CAROLINA

Docket No. 2018-113-C

| Re: | Application of Peak Tower, LLC for a             | )                      |
|-----|--|------------------------|
|     | Certificate of Public Convenience and            | )                      |
|     | Necessity to Provide Resold and Facilities-      | )                      |
|     | Based Local Exchange, Exchange Access and        | CERTIFICATE OF SERVICE |
|     | Interexchange Telecommunications Services in     | )                      |
|     | the State of South Carolina, and for Alternative | )                      |
|     | and Flexible Regulation, and a Request for       | )                      |
|     | Confidential Treatment                           | )                      |

I, Kathy Handrock, Paralegal for McNair Law Firm, P.A., do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

John J. Pringle, Jr., Esquire Adams and Reese, LLP 1501 Main Street, 5<sup>th</sup> Floor Columbia, SC 29201 C. Lessie Hammonds, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, South Carolina 29201

> Kathy Handrock, Paralegal McNair Law Firm, P. A. Post Office Box 11390

Columbia, South Carolina 29211

April 20, 2018

Columbia, South Carolina